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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANITA MIRALLE, JODII LE'GRAND	)	Case No. 4:18-cv-06823-HSG
EVERETT, I, TINA SCOTT, AIYAHNNA	)	
JOHNSON; IRVIN JOSUE	)	<b>STIPULATION AND ORDER TO</b>
HERNANDEZ ORTEGA; and AYAT	)	<b>CONTINUE EXPERT</b>
JALAL,	)	<b>DISCOVERY DEADLINES</b>
	)	
Plaintiff,	)	
	)	<b>Case Filed:</b> November 9, 2018
vs.	)	
	)	<b>Hon. Haywood S. Gilliam, Jr.</b>
CITY OF OAKLAND, a subdivision of	)	
the State of California; LIBBY SCHAAF;	)	
JOE DEVRIES; ANNE KIRKPATRICK;	)	
and SABRINA LANDRETH,	)	
	)	
Defendants.	)	

1 Pursuant to the Court Order of October 11, 2019, (ECF No. 77), the Court set the  
2 parties' expert discovery deadlines as follows:

3 Exchange Opening Expert Reports: February 14, 2020

4 Exchange Rebuttal Expert Reports: February 28, 2020

5 Close of Expert Discovery: April 10, 2020

6 The parties seek to continue the expert discovery deadlines considering the  
7 following good cause.

8 On January 15, 2020, the parties attended their first settlement conference in  
9 this matter before the honorable Joseph C. Spero. The parties are scheduled for a  
10 subsequent settlement conference on February 19, 2020, where they expect to have a  
11 more substantive discussion as to possible resolution of the matter. The current  
12 schedule requires the parties to exchange expert reports on February 14, 2020, prior to  
13 the next settlement conference. In seeking a continuance of the expert discovery  
14 deadline, the parties intend to reduce their respective expenses in the event that  
15 settlement discussions are fruitful.

16 The parties have sought a continuance to the case management deadlines in this  
17 matter once before. (ECF No. 69.) In that stipulation, the parties built in ample time  
18 between the conclusion of expert discovery and the deadline to file dispositive motions,  
19 to facilitate defendants' counsel's anticipated leave. As such, the newly proposed expert  
20 discovery deadlines do not disturb any remaining deadlines in the case. The parties do  
21 not anticipate that the proposed extension will impact the Court's calendar. In addition,  
22 separate and apart from preparing for and participating in court-mandated settlement  
23 activities, the parties have also continued to engage actively in fact discovery, including  
24 exchanging interrogatories, admissions, and document production, and taking and  
25 defending depositions, within the court's timelines to the extent possible given both  
26 parties' schedules.

27 The parties stipulate to and respectfully request that the Court continue the  
28 following expert discovery deadlines:

Event	Current Deadline	Proposed Deadline
Exchange Opening Expert Reports	February 14, 2020	March 13, 2020
Exchange Rebuttal Expert Reports	February 28, 2020	March 27, 2020
Close of Expert Discovery	April 10, 2020	May 1, 2020

Dated: January 30, 2020

SIEGEL, YEE, BRUNNER & MEHTA

By /s/ EmilyRose Johns

EmilyRose Johns

Attorneys for Plaintiff  
ANITA MIRALLE, JODII LE'GRAND  
EVERETT, I, TINA SCOTT,  
AIYAHNNA JOHNSON,  
IRVIN JOSUE HERNANDEZ ORTEGA,  
and AYAT JALAL

Date: January 30, 2020

BARBARA J. PARKER, City Attorney  
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By: /s/ Zoe Savitsky

Zoe Savitsky

Attorneys for Defendants,  
CITY OF OAKLAND, et al.

1 **ORDER**

2 IT IS HEREBY ORDERED that, pursuant to the stipulation of the Parties,  
3 which is recited above, and good cause in support thereof, that the expert discovery  
4 deadlines for matter be reset to the following:

- 5 • Deadline to exchange opening expert reports is March 13, 2020;  
6 • Deadline to exchange rebuttal expert reports is March 27, 2020;  
7 • Close of expert discovery is May 1, 2020.

8  
9 IT IS SO ORDERED.

10 Dated: January 31, 2020

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13 Hon. Haywood S. Gilliam, Jr.  
14 UNITED STATES DISTRICT COURT JUDGE  
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